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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE

Docket No. N2011-1

NOTICE OF THE PUBLIC REPRESENTATIVE OF FILING STIPULATED REVISION OF INTERROGATORY RESPONSE TO USPS/PR-T2-6

(October 25, 2011)

The Public Representative hereby provides notice that it is today filing a stipulated revision to interrogatory response USPS/PR-T2-6. The interrogatory requested an alternate illustration of the information shown in Graphic 1, on page 4 of witness Klingenberg's testimony (PR-T-2).

The Public Representative originally objected to interrogatory USPS/PR-T2-6, citing the clarity of Graphic 1, the United States Postal Service's control over the data used to create the graph, and the estimated time required for witness Klingenberg to generate an alternate visual.¹

On October 18, 2011, during oral cross-examination, witness Klingenberg offered to placate the Postal Service by working with the Postal Service's counsel to create an alternate visual. The Public Representative provides the result of this work, stipulated to by the Postal Service, as witness Klingenberg's revised response to USPS/PR-T2-6.

Respectfully Submitted,

/s/ Tracy N. Ferguson
Tracy N. Ferguson
Public Representative

901 New York Avenue, N.W. Washington, D.C. 20268-0001 (202) 789-6844; Fax (202) 789-6891 Tracy.Ferguson @prc.gov

¹ Notice of Public Representative of Filing Revised Responses of Public Representative Witness John P. Klingenberg to United States Postal Service Interrogatories (USPS/PR-T2-1-34) [Errata]

RESPONSE OF PUBLIC REPRESENTATIVE WITNESS KLINGENBERG TO INTERROGATORY OF THE UNITED STATES POSTAL SERVICE

USPS/PR-T2-6. Graphic 1, a map of the United States with all Postal Service offices, is overtly misleading because the RAOI offices are dark solid red with black outline and the open offices are very light blue with blue outline; one consequence is that the reds are always on top of the blues. Please produce a new variant of Graphic 1 that uses, and shows in its legend, three colors for the two underlying data types plus the intersection.

Response.

Post Offices Not on RAOI List





